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NJ33226FC

April 27, 2022

VIA: ECF

Honorable Michael A. Hammer
United States Magistrate Judge for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

RE: The Bank of New York Mellon FKA The Bank of New York as Trustee for the Certificateholders of CWALT Inc., Alternative Loan Trust 2007-7T2, Mortgage Pass-Through Certificates, Series v. Andrew J. Witty
Docket No.: 2:15-cv-00500-MCA-MAH

Dear Judge Hammer:

Pursuant to Your Honor's January 27, 2022 Order, please accept this letter as a status report updating the Court as to why the present action should not be dismissed. The file was removed from moratorium hold in February. Since then, our office refiled the *Lis Pendens* on the matter, and is working to set up the foreclosure sale with the United States Marshal's Office, however, yesterday Defendant filed a Petition to Dismiss this matter, which Plaintiff intends to address separately.

Plaintiff anticipates the sale can likely be scheduled within the next three (3) months if the petition is decided in its favor. We anticipate having the Writ of Execution sent for filing this week. According to the U.S. Marshal's Office, an appraisal is also needed for the property, no older than one year, so we are working to get an appraisal done prior to sending the property to the Marshal's Office for execution of the Writ.

Although there have been delays caused by State and Federally imposed foreclosure moratoria related to the COVID-19 pandemic, Plaintiff is still within its rights to pursue this foreclosure action, subject to the Court's approval. In the interest of judicial economy, Plaintiff begs the Court to please let the action remain open and not be dismissed.

Your Honor's consideration in this matter is greatly appreciated.

Respectfully submitted,
KML Law Group, PC

BY: /s/ *Denise Carlon, Esq.*
Denise Carlon, Esquire
Attorney for Plaintiff

cc: Andrew J. Witty (via Certified and Regular Mail to 496 White Oak Ridge Road, Short Hills,
NJ 07078)